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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

BAHRAM SHAKERI	)	CASE NO. 8:21-cv-00549
	)	
	)	
Plaintiff	)	
	)	
	)	PLAINTIFF’S REQUEST TO CLERK OF COURT
JEREMY ALLEN,	)	FOR ENTRY OF DEFAULT AGAINST
	)	DEFENDANT JEREMY ALLEN
Defendant	)	
	)	

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Plaintiff Bahram Shakeri, through undersigned counsel, requests that the Clerk of the Court enter an Entry of Default pursuant to Fed. R. Civ. P. 55(a) against Defendant Jeremy Allen. In support, Plaintiff states as follows:

1. Plaintiff initiated this case on March 3, 2021. [ECF No. 1].
2. On February 3, 2023, Plaintiff filed their Second Amended Complaint, naming Jeremy Allen as a defendant. [ECF No. 32].
3. The Second Amended Complaint was electronically filed and served through ECF to all counsel of record including Counsel for Prince George’s County. [ECF No. 32].
4. Despite numerous attempts to serve Jeremy Allen by personal service, as detailed in their Motion for Alternative Service, Plaintiff was unable to serve Jeremy Allen through personal service. [ECF No. 40].

5. On September 27, 2023, Plaintiff filed their Motion for Alternative Service, seeking a Court order allowing service of Defendant Allen through Prince George's County. [ECF No. 40].
6. On March 5, 2024, this Court granted Plaintiff's Motion for Alternative Service. [ECF No. 41].
7. On April 29, 2024, Counsel for Plaintiff asked Counsel for Prince George's County if he would accept service for Defendant Allen. [Exh. 1].
8. On May 1, 2024, Counsel for Prince George's County agreed to deem service as accepted as of May 1, 2024 and would file an answer twenty (20) days from that day. [Exh. 1].
9. Thus, Defendant Allen's answer was due on May 21, 2023.
10. On June 27, 2024, Plaintiff's Counsel reached out to Prince George's County counsel as there had been no answer filed at this time. [Exh. 1].
11. Plaintiff's counsel requested that Defendant Allen file an answer by July 5, 2024. [Exh. 1].
12. Plaintiff's counsel received no response, and to date, no answer has been filed in this matter by Defendant Allen.
13. Defendant has failed to timely file an answer, appear, or otherwise contest the allegations against him in this lawsuit and is now in default.
14. Plaintiff's counsel has not been contacted by counsel for Defendant to request an extension of time to file a response.

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests that the Clerk of Court enter an order of default against Defendant Jeremy Allen.

Respectfully submitted,

\_\_\_\_/s/ Faisal Gill\_\_\_\_\_

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### CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 9<sup>th</sup> day of July, 2024, I sent a copy of the Plaintiff's Request to Clerk of Court for Entry of Default against Defendant Jeremy Allen, through ECF electronic service, for which counsel for Prince George's County is a recipient, along with by mail to the following:

Corporal Jeremy Allen  
5135 Indian Head Highway  
Oxon Hill Md. 20745

Andrew J Murray  
Prince George's County Office of Law  
1301 McCormick Drive, Suite 4100  
Largo, MD 20774

Respectfully submitted,

\_\_\_\_/s/ Faisal Gill\_\_\_\_\_

Faisal Gill